

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

February 20, 2025

United States of America

v.

Nathan Ochsner, Clerk of Court

Jesus JUAREZ-Valadez aka Jesus JUAREZ-Valdez

Case No. **3:25-MJ-0002**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 13, 2025 in the county of Galveston in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1326 (a) and (b)(1)

Alien Unlawfully Found in the United States after Deportation, Having been
Previously Convicted of a Felony

This criminal complaint is based on these facts:

JUAREZ-Valadez is a native and citizen of Mexico who was last removed from the United States in 2009 and was found within the United States in La Marque, Tx most recently in February 2025. Said defendant did not obtain consent of the Attorney General of the United States or the Secretary of Homeland Security for application for readmission into the United States.

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Joel Mata Special Agent

Printed name and title

Sworn to me telephonically.

Date: 02/19/2025

City and state:

Bend, OR

Judge's signature

Andrew M. Edison, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joel Mata, being duly sworn by telephone, hereby depose and say:

(1) I am a Special Agent (SA) with Homeland Security Investigations (HSI) and have served in that capacity since April of 2006. Prior to this position, I served as a United States Border Patrol Agent beginning in 1998. I have over 26 years of immigration law enforcement experience.

(2) In May of 2023, I received information from an officer with the La Marque, Texas Police Department regarding a subject that was identified in an employee background check as someone who had been previously convicted for violations of 8 USC 1326(a) and 1326(b)(1) Illegal Re-Entry of Removed Aliens after having been Convicted of a Felony.

(3) After several months of surveillance and after conducting various law enforcement database checks, it was discovered that the Defendant, Jesus JUAREZ-Valadez aka Jesus JUAREZ-Valdez is the same individual as the person referred to in this Affidavit as having been previously convicted and deported.

(4) Based upon the information from immigration records as described below, and my training and experience, I submit that there is probable cause to believe that the Defendant is in violation of 8 U.S.C. § 1326(a) and (b).

(5) Element One: The Defendant is a citizen and national of Mexico and not a native, citizen or national of the United States.

(6) Element Two: The Defendant has previously been deported or removed from the United States on the following occasion(s):

- a. May 18, 2007
- b. July 22, 2009

(7) Element Three: After deportation, the Defendant was subsequently found in the United States on June 13, 2024, in Tiki Island, Galveston County, Texas, which is within the Galveston Division of the Southern District of Texas.

(8) Element Four: The Defendant did not have permission to re-enter the United States. I reviewed the contents of the Alien File associated with this Defendant and/or available database information and found no indication that the Defendant has ever received permission from the Attorney General of the United States, or the Secretary of the Department of Homeland Security, to apply for admission to the United States following deportation from the United States. I intend

to request certification of this fact from the Records Branch of the United States Citizenship and Immigration Service.

(9) Prior Criminal History. The Defendant has the following prior criminal history:

- a. On June 16, 1987, the Defendant Pleaded Nolo Contendere to Felony Failure to Stop and Render Aid in 56th Judicial District Galveston County.
- b. On October 27, 2006, the Defendant was convicted in Galveston County 405th Judicial District for Possession of Controlled Substance to wit cocaine; Sentenced to 3 years TDCJ.
- c. On October 7, 2008, the Defendant Pleaded Guilty to 8 USC 1326(a) and 1326(b)(1) in the Southern District Court Brownsville Division and was sentenced to 12 months and 1 day with the Bureau of Prisons.

On February 18, 2025, I contacted the U.S. Attorney's Office, Southern District of Texas, Galveston Division, concerning this criminal complaint. On or about that day, Assistant U.S. Attorney Christine Lu accepted this case for prosecution for a violation of 8 U.S.C. § 1326(a) and (b).



Joel Mata, Special Agent
U.S. Immigration & Customs Enforcement
Homeland Security Investigations

Signed and sworn telephonically before me this 20th day of February 2025, and I find probable cause.



Andrew M. Edison
United States Magistrate Judge
Southern District of Texas